

# **EXHIBIT B**

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST LITIGATION

Civil Action No. 18-cv-1776 (JRT/HB)

**DECLARATION ON BEHALF OF  
AMAZONFRESH, LLC**

DWT REF NO.: SUB1009294

Sarah Reichenbach declares as follows:

1. I am a litigation paralegal and provide this declaration on behalf of AmazonFresh, LLC (“Amazon”). I make this declaration based on my personal knowledge and my review of Amazon records kept and maintained in the ordinary course of business.

2. I am well versed and experienced at searching Amazon’s databases and using Amazon’s tools to collect purchase and sales data. In particular, I am qualified to design and execute database queries to retrieve product, sales, and customer information.

3. I understand that Plaintiffs in this case have served a subpoena on Amazon (the “Subpoena”) seeking information regarding Amazon’s purchases and sales of various pork products, including, but not limited to personally identifying information regarding the consumer-purchasers of such products.

1           4. Amazon has already produced to Plaintiffs certain information regarding consumer  
2 purchases of 283 pork products, but objects to producing its customer-purchasers' personally  
3 identifiable information.

4           5. If a class is ultimately certified, Amazon has the ability to identify the consumer-  
5 purchasers associated with the purchase transactions for which it has already produced information  
6 to Plaintiffs. Upon reaching agreement with Plaintiff regarding the relevant terms, Amazon has the  
7 ability and is willing to send an email notice regarding the class action litigation directly to those  
8 consumer-purchasers.

9  
10          I declare under penalty of perjury under the laws of the United States of America that the  
11 foregoing is true and correct.

12          EXECUTED this 23 day of June, 2022, at seattle, washington.

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14          DocuSigned by:  
15              
16            Sarah Reichenbach  
17            Litigation Paralegal  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June \_\_\_\_ 2022, I caused the foregoing document to be served by electronic mail to the following:

Breanna Van Engelen  
breannav@hbsslaw.com  
Abby Wolf  
abbyw@hbsslaw.com  
Abigail Pershing  
abigailp@hbsslaw.com

DATED this \_\_\_, day of June , 2022.

DAVIS WRIGHT TREMAINE LLP  
Attorneys for AmazonFresh, LLC

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